

April 19, 2007

Federal Communications Commission  
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RE: WC Docket No. 02-60

The California Primary Care Association (CPCA) supports the recommendation of the American Telemedicine Association (ATA) petition for reconsideration of the Rural Health Care Support Mechanism Second Report and Order. This petition requests that the Commission continue its practice of “grandfathering” rural sites that are no longer eligible for rural health care support under the Commission’s current definition of rural. We support this practice as it will allow more rural sites access to the valuable benefits of the Rural Health Care Program of the Universal Service Fund.

CPCA represents more than 700 not-for-profit community clinics and health centers in California who provide comprehensive, quality health care services to 3.6 million low-income, uninsured and underserved Californians. CPCA’s member clinics provide high quality medical, dental and mental health services, children’s day care, and early intervention programs for the working poor and uninsured. Five percent of these clinics are rural sites.

The Rural Health Care Program is integral to the delivery of vital services in rural health clinic sites as it provides support for telecommunications services used in the provision of health care. To not continue to grandfather previously eligible sites into the program will result in many rural health facilities terminating the use of telecommunication services, which will, in turn, negatively impact access to health services and quality care in rural and isolated communities.

Although we support the ATA’s petition, we also urge the Commission to reconsider the definition of “rural,” as the current definition excludes truly rural communities from receiving support. However, until the definition can be reconsidered, we urge the Commission to adopt ATA’s petition and continue to grandfather in communities eligible under the previous definition.

Sincerely,

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